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November 13, 2001

U.S. International Trade Commission
ATTN: **Ambassador Robert B. Zoellick**
U.S. Trade Representative
600-17th Street N.W.
Washington, D.C. 20508

Re: Certain Steel Products TA-201-73 (Final)

Dear Ambassador Zoellick:

I am writing this letter to you regarding the ITC's investigation of carbon steel plate.

Genesis Equipment & Manufacturing, Inc. produces specialized attachments that mount on hydraulic excavators used in the demolition and scrap industries, such as Shears, Grapples, Demopros, etc. To produce our equipment, we have important specifications both as to abrasion resistance and yield strength (130,000 psi). We purchase our steel plate from SSAB Oxelosund under the brand name "Hardox 130".

No U.S. mill can meet our specifications. We have tried for over twenty (20) years from companies such as USX and Lukens. These mills can make steel plate with lower yield strengths, such as 100,00 psi, but that is not sufficient for the equipment that we produce and sell.

Even when U.S. mills claim that they have the technical capability to produce to Genesis' specifications, these mills are unwilling to produce that plate because the market for such quality plate is too small to warrant such production.

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In summary, SSAB Oxelosund's plate should not be covered by any import relief. No mill in the United States can meet our specifications or our quantity needs. Restricting imports from SSAB Oxelosund will damage Genesis Equipment & Manufacturing, Inc. and its employees, but it will not help U.S. plate mills because this is not a product that they can produce.

Sincerely,

Kenneth R. LaBounty
President